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DAVID W. SHAPIRO (NYSBN 2054054)
United States Attorney

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN JOSE DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

SAY LYE OW,

Defendant.

No. CR-00-20110 JF

VIOLATION: 18 U.S.C. § 1832(a)(2) -
Copying a Trade Secret; 18 U.S.C.
§ 1834(a)(2) - Criminal Forfeiture

SAN JOSE VENUE

SUPERSEDING INFORMATION

The United States Attorney charges:

COUNT ONE: (18 U.S.C. § 1832(a)(2))

On or about July 24, 1998, in the Northern District of California, and elsewhere, the
defendant

SAY LYE OW,

with intent to convert a trade secret to the economic benefit of someone other than the owner thereof,
specifically, computer files relating to the design and testing of the Merced microprocessor (now
known as the Itanium microprocessor) belonging to Intel Corporation, found on a backup of the
computer system at 410 N. Mary Avenue, Sunnyvale, California, which trade secret is related to and
included in a product that is produced for and placed in interstate and foreign commerce, did copy

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1 such information without authorization, knowing that his act would injure Intel Corporation; in
2 violation of Title 18, United States Code, Section 1832(a)(2).

3 FORFEITURE ALLEGATIONS: (18 U.S.C. § 1834(a)(2))

4 The allegations of Count One of this Superseding Information are incorporated herein for the
5 purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18,
6 United States Code, Section 1834.

7 As a result of the offense alleged in Count One of this Superseding Information, defendant SAY
8 LYE OW shall forfeit to the United States all of the property used, and intended to be used, in any
9 manner and part, to commit and facilitate the commission of the aforesaid violation, taking into
10 consideration the nature, scope and proportionality of the use of the property in the offense,
11 specifically, the computer system which was located at his residence at 750 North Shoreline
12 Boulevard, Apartment #86, Mountain View, California.

13 DATED: September 6, 2001.

14 —
15 DAVID W. SHAPIRO
United States Attorney

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17 *Elizabeth De la Vega*
ELIZABETH DE LA VEGA
Chief, San Jose Branch

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19 (Approved as to form: *Ross W. Nadel*)

AUSA ROSS W. NADEL